1 2 3 4 5	DAVID J. MARTIN, ESQ. DAVID J. MARTIN PLLC NEVADA BAR NO. 9117 304 S. JONES BLVD, #4461 LAS VEGAS, NEVADA 89017 (t) 984-298-5470 David@djmartinlawnc.com		
6	LINITED STATE	ES DISTRICT COURT	
8	FOR THE DISTRICT COURT OF NEVADA		
9			
10	WILLIAM EDDINS,		
11	Plaintiff,		
12	v.	Case No.: 2:23-cv-01497-JCM-MDC	
13		JOINT DISCOVERY PLAN AND	
14	LLV CHINATOWN PLAZA, LLC,	SCHEDULING ORDER	
15	Defendant.	Submitted in Compliance with LR 26-1(b)	
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19	Plaintiff William Eddins ("Plaintiff"), through his counsel of record David J. Martin,		
20	Esq.; and Defendant LLV Chinatown Plaza, LLC, through its counsel of record Sklar		
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22	Williams PLLC ("Defendant," and together with Plaintiff, the "Parties"), hereby file this		
23   24	joint discovery plan and scheduling order in compliance with Local Rule 26-1(b).		
25	1. <b>Meet and Confer</b> . Pursuant	to Fed. R. Civ. P. 26(f) and Local Rule 26-1(a),	
26			
27	the following parties conferred via telephonic conference on February 16, 2024:		
28	a. David J. Martin, Esq., for Plaintiff; And		
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- b. Johnathon Fayeghi, Esq., for Defendant.
- 2. **Pre-Discovery Disclosures.** The Parties are prepared to exchange Initial Disclosures as required by Fed. R. Civ. P. 26(a)(1) on or before **March 8, 2024**.
- 3. **Discovery Cut-Off Date**. Defendant first answered or otherwise appeared on December 22, 2023. The Parties request a discovery period of one hundred eighty (180) days from December 22, 2023. Therefore the discovery cut-off date is **Wednesday June 19, 2024**.
- 4. Amending the Pleadings and Adding Parties. The deadline to amend the pleadings and add parties shall not be later than ninety (90) days prior to the close of discovery or Thursday March 21, 2024.
- 5. **Expert and Rebuttal-Expert Disclosures**. The deadline to disclose experts shall be made sixty (60) days before the discovery deadline or **Monday April 22, 2024** (60 days falls on Saturday April 20, 2024). The deadline to disclose rebuttal experts shall be due thirty (30) days after the initial disclosure of experts or **Monday May 22, 2024**.
- 6. **Dispositive Motions**. The deadline to file dispositive motions shall be not later than thirty (30) days after the discovery cut-off date or **Friday July 19, 2024**.
- 7. **Pretrial Order**. The Joint Pre-Trial Order shall be filed not later than thirty (30) days after the date set for filing dispositive motions or **Monday August 19, 2024** (30 days falls on Sunday August 18, 2024). However, in the event that dispositive motions are filed, the date for filing the Joint-Pre-Trial Order shall be suspended until thirty (30) days after a decision on the dispositive motions or further order of the Court.

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- 8. **Fed. R. Civ. P. 26(a)(3) Disclosures**. The disclosures required by Rule 26(a)(3) and any objections thereto shall be included in the joint pretrial order.
- 9. No changes should be made on the limitations on discovery imposed under the Federal Rules of Civil Procedure or local rules, or on the subject matters or timing of discovery.
- 10. Discovery does not need to be conducted in phases or limited or focused on particular issues.
- 11. **Alternative Dispute Resolution**. The Parties certify that they met and conferred about the possibility of using alternative dispute-resolution processes including mediation, arbitration, and if applicable, early neutral evaluation.
- 12. **Alternative Forms of Case Disposition**. The Parties certify that they considered consent to trial by a magistrate judge under 28 U.S.C. § 636(c) and Fed. R. Civ. P. 73 and the use of the Short Trial Program (General Order 2013-01).
- 13. **Electronic Evidence**. The parties certify that they discussed whether to present evidence in electronic format to jurors for the purpose of jury deliberations.

## IT IS SO STIPULATED.

David J. Martin, Esq. David J. Martin PLLC 304 S. Jones Blvd, #4661 Las Vegas, Nevada 89017 Attorney for Plaintiff Jonathon Fayeghi, Esq. (NBN 12736) David B. Barney, Esq. (NBN 14681) Sklar Williams, PLLC 410 S. Rampart Blvd, Suite 350 Las Vegas, Nevada 89145 Attorney for Defendant

IT IS SO ORDERED

Dated this 26 day of February, 2024

UNITED STATES MAGISTRATE JUDGE

DISTRICT OF NEVADA